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Posted At: Thursday, May 18, 2006 5:22 PM
Posted To: Western Comments
Conversation: Phase II NPDES Draft Permit Comments
Subject: Phase II NPDES Draft Permit Comments

Dear Sir and/or Madam

The Port of Seattle has reviewed the NPDES and State Waste Discharge General Permit from Small Municipal Separate Storm Sewers in Western Washington (Phase II Permit) and requests that Ecology clarify the relationship between the MS4 Permittee and entities within their incorporated area that hold an individual permit. The Port requests that language be added to the Phase II Permit that ensures the Port's responsibilities for compliance with the Airport's individual permit remain entirely with Ecology and not the MS4 Permittee.

As you may be aware, the Port of Seattle has been issued an individual NPDES permit for stormwater and industrial wastewater discharges from the Seattle-Tacoma International Airport (Airport). The Phase II permit clearly indicates that individual permit holders are not required to apply for and obtain coverage under the Phase II permit. However, it is not clear whether the Airport would be responsible to the MS4 Permittee (e.g., City of SeaTac) for compliance with the Phase II Permit or if the Permittee would be responsible for ensuring Port compliance with the Airport's individual permit.

Ecology and the Port have invested considerable time and energy developing a comprehensive individual NPDES permit for the Airport. The Airport's permit requires a high level of accountability to Ecology. Additional Phase II administrative requirements and responsibilities would not be necessary and would not provide an incremental degree of environmental protection.

Thanks you for considering our comment.

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